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August 27, 1993

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CERTIFIED MAIL
RETURN RECEIPT REQUESTEDMr. Ruben B. McCullers
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101Re: The Knapheide Mfg. Co. ("Knapheide")
Consolidated Consent Agreement and Consent Order
Docket Nos. VII-92-H-008 and VII-93-T-499 (the "Consent Order")
Revised Environmental Audit Plan ("Audit Plan") and
Closure Plan ("Closure Plan")

Dear Ruben:

I am writing this letter in response to your letter of August 13, 1993 (received by Knapheide on August 17, 1993) concerning the Revised Environmental Audit Plan and Closure Plan. Knapheide is willing to accept the revisions suggested in your August 13, 1993 letter, subject to the conditions we discussed, as follows:

1. Knapheide requires additional time for implementation of the Audit Plan and Closure Plan because the facility is still flooded and inaccessible for operations. When personnel are again allowed access to the facility, Knapheide can then evaluate the current site conditions. At that time, Knapheide will suggest revisions to the Audit Plan and possibly the Closure Plan based upon such site conditions. Since Knapheide cannot now determine when it will be able to access the facility again, Knapheide cannot set a date for completing the evaluation. Knapheide will, however, update you by the end of October regarding the actions, if any, which it has been able to take at that point.

2. During the next two months, Knapheide will proceed with conducting the personnel interviews required by the Audit Plan.

3. Any actions which would otherwise be required of Knapheide upon approval of the Audit Plan or Closure Plan pursuant to (i) the Consent Order, or (ii) the Audit Plan or Closure Plan are also accordingly extended based upon the above timetable and such other future extensions as may be agreed to by the parties. The audit schedule currently set forth in the Audit Plan and in the Closure Plan will be revised when Knapheide presents to EPA any suggested revisions to the Plans for review and approval.

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Mr. Ruben B. McCullers
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4. Upon EPA's acknowledgement of the acceptability of the contents of this letter, Knapheide will submit for reimbursement the \$16,355 in qualifying expense for the Audit Plan which has been previously expended, and approved in the Order for reimbursement.

Very truly yours,

RUDNICK & WOLFE


Sandra L. Oberkfell

SLO/bd

M6:SLO0053

cc: Mr. Gerry Korb
Mr. William Lindsay

M6:SLO0053